

1. INTRODUCTION

In accordance with the U. S. Environmental Protection Agency's (US EPA) August 2, 1996 "Guidance for Major Source Determinations at Military Installations *under the Air Toxics, New Source Review, and Title V Operating Permit Programs of the Clean Air Act (Act)*" and *correspondence addressing Marine Corps Base, Camp Pendleton (MCB, Camp Pendleton) specific concerns dated July 22, 1996 from EPA Region IX*, MCB, Camp Pendleton proposes to modify its stationary source determination. This proposal addresses the breakout of military functions, utilizing the functional and common control prongs of the US EPA guidance, and the equitable treatment of community support services found at MCB, Camp Pendleton based on the EPA Guidance and the July 22, 1996 letter.

Background

Camp Pendleton is the Marine Corps' amphibious training center for the west coast, and the only west coast military installation where a comprehensive air, sea and ground assault training scenario can be executed. MCB, Camp Pendleton supports assigned tenants of the Fleet Marine Force (which includes the I Marine Expeditionary Force (IMEF), 1st Marine Division (1st MARDIV), 1st Force Service Support Group (1st FSSG), and components of the 3rd Marine Aircraft Wing (3rd MAW)), US Navy commands, a US Army command and other military and federal activities. The Base is also host to many unrelated private, federal, state and local government activities through real estate agreements.

The mission of MCB, Camp Pendleton is to operate the finest amphibious base possible to promote the combat readiness of Marines, Soldiers and Sailors by providing necessary facilities and services; to support the deployment of the Fleet Marine Force and other organizations; and to provide support and services responsive to the needs of Marines, Sailors and their families. In many ways Camp Pendleton is analogous to a city or county that houses military operations, and the Commanding General (CG), MCB, Camp Pendleton has responsibilities analogous to a city's mayor.

Approach

Consistent with Camp Pendleton's goals for equitable treatment under the Clean Air Act, MCB, Camp Pendleton proposes an approach utilizing the US EPA guidance and the correspondence from the EPA Regional Administrator, Ms. Felicia Marcus dated July 22, 1996 applying the common control, contiguous and adjacent relationship of "controlling entities" and "functional groupings" to make stationary source determinations. Of specific concern is the handling of Community Support activities aboard Camp Pendleton. This concern was recognized by the above referenced US EPA letter which states that "We recognize that Camp Pendleton houses many functions that are more municipal than industrial in nature and that these municipal functions are at the core of your concern regarding our major source definition.

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We agree with you that we still must address the appropriate treatment of these municipal functions and we are committed to developing and are currently working on potential solutions." This is the basis of proposing equitable treatment of Community Support activities to that of similar activities found in surrounding communities.

Functions

MCB, Camp Pendleton is host to numerous functions, both military and community support in nature. The military functions include aviation operations (A), sea operations (SE), ground operations (G), military schools (SC), military research and development (R), military support (S) and range management (RM); community support functions involve activities supporting personnel-related amenities and community services. Examples of personnel-amenities (P) functions include general merchandise stores, food stores, gasoline service stations, restaurants, barracks and general residential, temporary lodging, personal services, automotive services, legal services, personal communications, schools, amusement and recreation, and related construction and maintenance activities. Community service functions include public utility services (U) such as electric, gas, water and sanitary services; public safety (SA) services such as military police, military brigs and fire departments; public health (H) services such as hospitals, medical and dental clinics; and environmental restoration (RE) projects. Facilities supports both community support and military activities at Camp Pendleton. Facilities will be grouped with the military functions, as the facilities service are more general in nature, encompassing activity throughout the Base.

2. Military/Facilities Functions

The following military/facilities functions are found on Camp Pendleton: ground operations (G); aviation operations (A); sea operations (SE); military schools (SC); military research & development (R); military support (S), range management (RM) and facilities (F). Operational forces assigned to each function are often independent of each other, joining with forces from other military functions, other Marine Corps installations, and other military services on an infrequent basis to execute training in the field.

Approach: Consistent with the US EPA guidance Camp Pendleton proposes eight unique military/facilities functions. The stationary source determination of military/facilities functions are evaluated based on common control at the service level and the operational function.

1. Ground Operations (G): Ground operations include those emission units associated with or supporting ground-based military operations, including the planning, support and operation of military operations and training. The activities of the I MEF, 1st MARDIV, 1st FSSG, Army

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Reserve Center, 4th Marine Division, and Reserve Support Unit are considered ground operations.

2. Aviation Operations (A): Aviation operations include those emission units that support the takeoff and landing of aircraft, aircraft storage, aircraft servicing and aircraft repair. The activities of the 3rd Marine Aircraft Wing and the Marine Corps Air Station are considered to be aviation operations.

3. Sea Operations (SE): Sea operations include those emission units that support transportation on the open seas or inland waters, including operations, maintenance and associated facilities. The Assault Craft Unit 5, which operates the Landing Craft Air Cushioned Complex, is the main activity engaged in sea operations at Camp Pendleton.

4. Military Schools (SC): Military schools are those activities engaged in training individual Marines and Sailors in qualifying skills required for operations in the field, in the air and at sea. These schools are distinguished from the above military operations which train for unit military readiness. Military schools found on Camp Pendleton include the Marine Corps Recruit Depot's Weapons Field and Training Battalion, the Marine Corps Base's School of Infantry, Field Medical Service School, the Fleet Hospital Operations and Training Command and the Assault Amphibian School Battalion.

5. Military Research and Development (R): Military research and development includes activities engaged in providing engineering, research, development and testing of military technology. The Marine Corps Tactical Systems Support Activity and the Amphibian Vehicle Test Branch are the primary commands on Camp Pendleton that conduct research and development of military technology.

6. Military Support (S): Military support includes those activities that support multiple military functions such as fleet vehicle support, and financial, administrative and technical support needed to sustain military operations throughout the Base. The primary activity engaged in military support is Marine Corps Base, Camp Pendleton (MCB, Camp Pendleton) which supports assigned tenants of the Fleet Marine Force (which includes the I MEF, 1st MARDIV, 1st FSSG, and components of the 3rd Marine Aircraft Wing (3rd MAW)), Navy commands, an Army command and other military and federal activities. Activities under the cognizance of the Defense Logistics Agency and the General Services Administration providing military support have been grouped with the other Marine Corps support activities as one stationary source.

7. Range Management (RM - no permits): Range Management oversees and authorizes the use of the undeveloped land used for live-fire ranges, maneuver areas, aerospace and amphibious area management by the Marines, Navy, Army, National Guard and other federal, state and local agencies such as the FBI, U.S. Border Patrol, California Highway

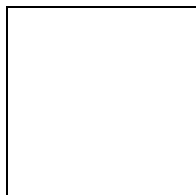
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Patrol, area police and sheriff departments. The land is also utilized for conservation measures and outdoor recreational activities. There are currently no permitted emission units associated with range management.

8. Facilities Maintenance (F): Includes all emission units that are engaged in heavy construction, such as asphalt paving; grading; flood control projects; and construction of roads and streets, water systems, sewer systems and communications and power lines. Includes work performed by the Base shops for installation of roofing and siding, painting, glass work, masonry, woodworking, carpentry and floor work, welding, electrical and masonry work, steam fitting, sump pump installation and servicing, plumbing, heating and air conditioning.

Military/Facility Stationary Sources: The military/facilities functional segregation when utilizing the eight (8) proposed functions evaluated at the military service level results in the following eleven (11) separate stationary sources: eight (8) sources under Marine control: air operations, ground operations, sea operations, military support, military R&D, military schools, facilities and range management (no permitted emission units); two (2) sources under Navy control include sea operations and military schools (no permitted emission units); and the Army controlling one (1) ground operations source. Table 1 summarizes the emissions of permitted emission units by proposed stationary source. Attachment (A) provides a detailed listing of all permitted emission units grouped by the proposed stationary source.

Table 1: Summary of Military/Facility
Stationary Source Emissions



3. COMMUNITY SUPPORT FUNCTIONS

The US EPA letter from Felicia Marcus to the Commanding General, Camp Pendleton, included as Attachment (B), and the US EPA August 2, 1996 Guidance for Major Source Determinations at Military Installations provide the basis for which Camp Pendleton proposes handling community services as distinct and separate functions. Camp Pendleton proposes that "Community Support" functions are operations that are provided to support the residents and transient daytime working community, and includes functions that are not considered essential to military operations and training. These services are provided for the convenience of active duty and retired military personnel, their dependents, DOD civilian employees and others that utilize the Base. The following approach is consistent with the USEPA August 2, 1996, Guidance

which states: "The EPA also believes that certain personnel-related activities at military installations may appropriately be considered *not* to be support facilities to the primary military activities at a Base and, therefore, **they can be considered separate sources**. Examples of these types of activities include residential areas, schools, day care centers, churches, recreational parks, theaters, shopping centers, grocery stores, gas stations and dry cleaners. These activities may be treated as separate sources for all purposes for which an industrial grouping distinction is allowed, but they should be separately evaluated for common control, SIC code and support facility linkages to determine if a major source is present." Additionally, the EPA letter from Felicia Marcus to the Commanding General, Camp Pendleton addresses concerns made that Camp Pendleton "houses many functions that are more municipal than industrial in nature..." and that EPA "would like to address this issue on a base-specific basis...". Municipal functions aboard Camp Pendleton are evaluated as community support activities and include activities such as: medical centers, water and sewage treatment facilities, communication systems, environmental restoration, and other activities that are analogous to services provided within a community.

Approach: Consistent with the US EPA guidance and EPA Region IX's July 22, 1996 correspondence, Camp Pendleton proposes Community Support activities be considered separate sources. The following categories were utilized to evaluate community support activities: personnel-amenities (P), public utilities (U), public safety (SA), public health (H) and environmental restoration (RE). To identify the stationary sources in each category of operations, functionally similar and independent community support activities located adjacent to one another would be considered to be separate sources when functionally dissimilar activities or differences in common control separate the operations. For example, two contiguous and adjacent bachelor enlisted quarters would be considered part of the same source because they are similar functions under common control. Two residential houses adjacent to each other would be considered separate sources because they are under separate control, even though they represent the same function. The following community support activities are found on Camp Pendleton:

1. Personnel-Amenities (P): Includes a broad range of activities present at Camp Pendleton that generally mirror services provided residents of surrounding communities. Personnel-Amenities (P) generally fall under three categories: residential, retail and service. Personnel-Amenities (P) include stores, restaurants, gas stations, auto repair facilities, amusement and recreation facilities, and other services both trade and professional such as barber shops, shoe repair shops, income tax preparation services, laundry facilities and personal legal services. This also includes such services as the shipment and storage of personal belongings, libraries, university extensions; social services such as child care centers and family service centers; lodging, barracks and general residential support; religious facilities; facilities supporting personal communication; and the maintenance activities necessary to maintain the personnel-amenities activities.
2. Public Utilities (U): Includes the emission units associated with the operation and maintenance of waste water treatment, drinking water distribution, landfill operations and electrical distribution.
3. Public Safety (SA): Includes emission units that are associated with justice, public order and safety. Emission units directly supporting

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the Military Police, Fire Department, legal prosecution/ defense activities, Brig and Base Safety Offices include boilers, generators and fire pumps.

4. Public Health (H): Includes all emission units that are associated with the medical, surgical, dental and other health services to persons.

5. Environmental Restoration (RE): Includes all emission units in support of cleanup activities related to soil and groundwater contamination.

Community Support Stationary Sources: The US EPA guidance and July 22, 1996 correspondence, when applied to community support activities aboard MCB, Camp Pendleton, results in 19 personnel-amenities, 2 public health, 9 public safety, 24 public utilities, and 3 remediation stationary sources that currently have emission units requiring a permit to operate. Table 2 provides a summarized listing of emissions from community support stationary sources. Note that emissions summarized in Table 2 are listed as tons per year, and that a detailed listing of the emissions from each permitted emission units associated with the proposed sources and their emissions listed as pounds per year are found in Attachment (A).

4. MANAGEMENT OF PROPOSED STATIONARY SOURCES:

While this proposal focuses on stationary sources possessing permitted emission units, it is important to acknowledge the fact that many community support activities do not have permitted emission units. Such community support activities would be handled in the same manner as that proposed in section 3, with associated emissions specific to the specific community support activity. It is anticipated that pollution prevention initiatives will result in the number of community support activities possessing permitted emission units to decrease.

A specific area of concern is how emissions from military functions in the South Coast Air Quality Management District (SCAQMD) will be accounted. MCB, Camp Pendleton includes a small section in the northern portion of the base residing in the SCAQMD. Emissions

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Table 2: Community Support Emissions
By Stationary Source

SS ID	FUNCTION	COMMENTS	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
P-1	PERSONNEL AMMENITIES	AUTO HOBBY SHOP	0.22	0.00	0.00	0.00	0.00	
P-2	PERSONNEL AMMENITIES	BASE HSG HQ	0.00	0.00	0.01	0.00	0.00	
P-3	PERSONNEL AMMENITIES	COMMISSARY	0.00	0.00	0.00	0.00	0.00	
P-4	PERSONNEL AMMENITIES	SUBST. ABUSE CTR	0.00	0.21	0.06	0.01	0.00	
P-5	PERSONNEL AMMENITIES	DINING FACILITY	0.00	0.00	0.01	0.00	0.00	
P-6	PERSONNEL AMMENITIES	FAMILY SERVICE CENTER	0.00	0.00	0.00	0.00	0.00	
P-7	PERSONNEL AMMENITIES	GOLF COURSE	0.02	0.00	0.00	0.00	0.00	
P-8	PERSONNEL AMMENITIES	GYMNASIUM	0.00	0.21	0.13	0.03	0.00	
P-9	PERSONNEL AMMENITIES	MARS RADIO STATION	0.00	0.00	0.00	0.00	0.00	
P-10	PERSONNEL AMMENITIES	MWR GAS STATION	2.84	0.00	0.00	0.00	0.00	
P-11	PERSONNEL AMMENITIES	MWR GAS STATION	0.21	0.00	0.00	0.00	0.00	
P-12	PERSONNEL AMMENITIES	MWR GAS STATION	0.95	0.00	0.00	0.00	0.00	
P-13	PERSONNEL AMMENITIES	MWR GAS STATION	0.04	0.00	0.00	0.00	0.00	
P-14	PERSONNEL AMMENITIES	MWR GAS STATION	0.92	0.00	0.00	0.00	0.00	
P-15	PERSONNEL AMMENITIES	MWR GAS STATION	0.14	0.00	0.00	0.00	0.00	
P-16	PERSONNEL AMMENITIES	MWR GAS STATION	1.08	0.00	0.00	0.00	0.00	
P-17	PERSONNEL AMMENITIES	MWR MOTOR POOL	0.00	0.21	0.06	0.01	0.00	
P-18	PERSONNEL AMMENITIES	TELEPHONE CENTER	0.00	0.00	0.01	0.00	0.00	
P-19	PERSONNEL AMMENITIES	TELEPHONE SYSTEM	0.01	0.00	0.10	0.02	0.01	
	PERSONNEL AMMENITIES		6.42	0.64	0.39	0.09	0.02	
H-1	PUBLIC HEALTH	DENTAL CLINIC	0.00	0.00	0.00	0.00	0.00	
H-2	PUBLIC HEALTH	HOSPITAL	0.07	0.01	3.48	0.87	0.07	
	PUBLIC HEALTH		0.07	0.01	3.48	0.87	0.07	
SA-1	PUBLIC SAFETY	FIRE STATION	0.00	0.00	0.00	0.00	0.00	
SA-2	PUBLIC SAFETY	BRIG	0.00	0.00	0.01	0.00	0.00	
SA-3	PUBLIC SAFETY	FIRE STATION EMG. GENERATOR	0.12	0.00	0.00	0.00	0.00	
SA-4	PUBLIC SAFETY	FIRE PUMP	0.00	0.00	0.02	0.01	0.00	
SA-5	PUBLIC SAFETY	FIRE PUMP	0.00	0.00	0.00	0.00	0.00	
SA-6	PUBLIC SAFETY	FIRE PUMP	0.00	0.00	0.01	0.00	0.00	
SA-7	PUBLIC SAFETY	PROVOST MARSHALL	0.00	0.00	0.01	0.00	0.00	
SA-8	PUBLIC SAFETY	FIRE PUMP	0.00	0.00	0.00	0.00	0.00	
SA-9	PUBLIC SAFETY	FIRE PUMP	0.00	0.00	0.00	0.00	0.00	
	PUBLIC SAFETY		0.13	0.00	0.07	0.01	0.00	
U-1	PUBLIC UTILITIES	FILTRATION PLANT	0.00	0.00	0.07	0.01	0.00	
U-2	PUBLIC UTILITIES	SEWAGE LIFT STATION	0.00	0.00	0.01	0.00	0.00	
U-3	PUBLIC UTILITIES	SEWAGE LIFT STATION	0.00	0.00	0.01	0.00	0.00	
U-4	PUBLIC UTILITIES	TUB GRINDER	0.01	0.00	0.12	0.03	0.01	
U-5	PUBLIC UTILITIES	SWGE LIFT STATION	0.00	0.00	0.02	0.00	0.00	
U-6	PUBLIC UTILITIES	SWGE LIFT STATION	0.00	0.00	0.03	0.01	0.00	
U-7	PUBLIC UTILITIES	SWGE LIFT STATION	0.00	0.00	0.04	0.01	0.00	
U-8	PUBLIC UTILITIES	WATER PUMP	0.00	0.00	0.03	0.01	0.00	
U-9	PUBLIC UTILITIES	WWTP #8	0.00	0.00	0.01	0.00	0.00	
U-10	PUBLIC UTILITIES	CENTRAL HEATING PLANT	0.04	0.01	1.79	0.45	0.04	
U-11	PUBLIC UTILITIES	LIFT STATION	0.00	0.00	0.00	0.00	0.00	
U-12	PUBLIC UTILITIES	WATER WELL	0.00	0.00	0.01	0.00	0.00	
U-13	PUBLIC UTILITIES	WWTP	0.00	0.00	0.03	0.01	0.00	
U-14	PUBLIC UTILITIES	SEWAGE LIFT STATION	0.00	0.00	0.03	0.01	0.00	
U-15	PUBLIC UTILITIES	WWTP	0.01	0.00	0.05	0.01	0.00	
U-16	PUBLIC UTILITIES	WATER TOWER	0.00	0.00	0.01	0.00	0.00	
U-17	PUBLIC UTILITIES	SEWAGE PLANT	0.00	0.00	0.02	0.00	0.00	
U-18	PUBLIC UTILITIES	WWTP	0.02	0.00	0.03	0.01	0.00	
U-19	PUBLIC UTILITIES	WWTP	0.00	0.00	0.01	0.00	0.00	
U-20	PUBLIC UTILITIES	SEWAGE LIFT STATION	0.00	0.00	0.01	0.00	0.00	

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from this section are de minimis in nature. The last emissions inventory reported for MCB, Camp Pendleton emissions in the SCAQMD reported 0.001 tons/yr of volatile organics, 0.004 tons/yr of sulfur dioxide, 0.096 tons/yr of oxides of nitrogen and 0.011 tons/yr of particulate matter less than 10 micron. Permitted emission units in the SCAQMD include two, 2.5 million BTU, propane fired boilers. The two permitted boilers are designated as community support, providing heat and hot water to a dining facility. The emissions from these two permitted community support boilers would count only towards the specific identified community support stationary source, as discussed in section 3 of this proposal. Emissions from unpermitted emission units would be evaluated to determine whether the emission are associated with community support or military operations. For determining SCAQMD major source applicability, only emissions associated with equipment in the SCAQMD would be considered. This is consistent with the approach taken at Naval Air Weapons Station, China Lake.

Upon agreement with the proposed stationary source approach Camp Pendleton will work with the District to revise the effected permits to reflect the stationary source determination and provide emissions information needed to make the stationary source determinations.